

Federal Trade Commission

August 22, 1969

Mr. James A. Trodden
Federal Trade Commission
26 Federal Plaza
New York, New York 10007

Dear Mr. Trodden:

I am replying to you herewith, according to the instructions of Mr. Albert G. Seidman, following my examination of his recent undated letter concerning fur (from lambs or other animals) treated with lead acetate (as a dye) and used for trimming wearing apparel. This matter was discussed previously in my letter of May 28 addressed to you, and certain items of information have been provided in Mr. Seidman's letter by personnel of the Food and Drug Administration, apparently in partial response to questions in my letter.

1. It is apparent from the analytical data supplied in Mr. Seidman's letter that widely variable and relatively large quantities of lead are readily available (through extraction by water) in the fur so treated, through ordinary contact with its moistened surface.
2. The process by which the lead acetate was applied on the fur (some of it may have been "in" the fur in a loosely combined manner), would seem to have been very crude to have provided such seemingly excessive quantities of the lead compound.
3. It does not seem to me that any such abnormality as "pica," (which I believe to be an over-emphasized factor in the ingestion of lead by infants and children, many of whom merely exhibit a juvenile tendency to put things in their mouths), is a necessarily important factor in such hazard as may exist in this situation, as between a mother, wearing such a garment, and her children, or any other similarly clothed person whose contact with infants and quite small children is of regular occurrence. I am not certain that any such actual hazard would exist under ordinary circumstances, but I am by no means certain that no hazard would exist or that the hypothetical hazard would be of negligible proportions.
4. I suspect that, if the process employed were subjected to critical examination, so as to limit the quantities of lead compound to the minimum required to achieve the desired result, or to remove an excess of the lead compound from the fur after the desired result had been obtained, any potential hazard could be reduced to the vanishing point. In any case, the method of dyeing the fur should, it seems, be known in detail, and examined from the aspect of reducing or eliminating the hazard.
5. In my opinion, those who are responsible for the exploitation of this process of dyeing furs, or for their distribution and use, should be required to produce information and evidence for the purpose of demonstrating that no probable hazard to the handlers and wearers of these furs, nor to others, including infants and

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children, is associated with their preparation, marketing and use. There is, I believe, a valid question here, which should be resolved on the basis of comprehensive information. It will be noted that reference has been made in this paragraph to potential hazards involving the handlers and wearers of these furs, in addition to infants and children. It is quite possible that contact of the hands of those who handle and wear garments of this type may be sufficiently contaminated (with sufficient frequency) to result in the ingestion (swallowing) of appreciable amounts of lead. It may be presumed that the ingestion of lead from this source would diminish with time and soon become (perhaps) insignificant. The potentialities of such exposure to lead should be investigated, with respect to the quantities which may be involved, and the duration of their availability.

It may be that the queries raised in these paragraphs are excessively exacting. On the other hand, persistent inquiry into the sources of lead in the modern human environment must be made to prevent minor increases in a large number of environmental factors, which collectively may result in a gradual but significant, progressive increase in the lead content of the human body as time goes on. Matters of inconvenience or expense to entrepreneurs or distributors of products of dubious significance in such matters should not be permitted to obstruct such inquiry as may be necessary to differentiate significant from insignificant sources of public hazard.

Signed:

Robert A. Kehoe, M.D.
Professor Emeritus of
Occupational Medicine

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